

**FILED**

August 09, 2023

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
By: DT  
Deputy

**UNITED STATES OF AMERICA,****Plaintiff,****v.**

**(1) PARIS NEAL DE LA TORRE and  
(2) ELRICO ESSELY TUNSTALL,**

**Defendants.****Case No: EP:23-CR-01532-KC****INDICTMENT**

**CT 1:** 8 U.S.C. §§ 1324(a)(1)(A)(v)(I),  
(a)(1)(A)(ii) and (a)(1)(B)(i) - Conspiracy to  
Transport Aliens;

**CT 2:** 8 U.S.C. §§ 1324(a)(1)(A)(ii) and  
(a)(1)(B)(i) - Transporting Aliens for Financial  
Gain.

THE GRAND JURY CHARGES:

**COUNT ONE**

(8 U.S.C. §§ 1324(a)(1)(A)(v)(I), (a)(1)(A)(ii) and (a)(1)(B)(i))

On or about July 17, 2023, in the Western District of Texas, Defendants,

**(1) PARIS NEAL DE LA TORRE and (2) ELRICO ESSELY TUNSTALL,**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with others to the Grand Jury unknown, to commit an offense against the United States, namely: to transport and move and attempt to transport and move aliens within the United States knowing and in reckless disregard of the fact that said aliens had come to, entered, and remained in the United States in violation of law, said transportation being in furtherance of said violation of law, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), (a)(1)(A)(ii) and (a)(1)(B)(i).

**COUNT TWO**

(8 U.S.C. §§ 1324(a)(1)(A)(ii) and (a)(1)(B)(i))

On or about July 17, 2023, in the Western District of Texas, Defendants,

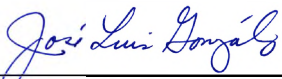
**(1) PARIS NEAL DE LA TORRE and (2) ELRICO ESSELY TUNSTALL,**

knowing and in reckless disregard of the fact that aliens had come to, entered and remained in the United States in violation of law, transported and moved, and attempted to transport and move such aliens within the United States in furtherance of said violation of law, all done for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (a)(1)(B)(i).

A TRUE BILL.

  
FOREPERSON OF THE GRAND JURY

JAIME ESPARZA  
UNITED STATES ATTORNEY

BY:   
Assistant U.S. Attorney